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8 *Mellon fka The Bank of New York as Trustee*
9 *for the Certificateholders CWMBS, Inc., CHL*
Mortgage Pass-Through Trust 2005-HYB4,
Mortgage Pass-Through Certificates, Series
2005-HYB4

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THE BANK OF NEW YORK MELLON FKA
13 THE BANK OF NEW YORK AS TRUSTEE
14 FOR THE CERTIFICATEHOLDERS CWMBS,
15 INC., CHL MORTGAGE PASS-THROUGH
16 TRUST 2005-HYB4, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-
HYB4;

17 Plaintiff,

18 vs.

19 SUNRISE RIDGE MASTER HOMEOWNERS
20 ASSOCIATION; SFR INVESTMENTS POOL 1,
21 LLC; and NEVADA ASSOCIATION
SERVICES, INC.,

22 Defendants.
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Case No. 2:17-cv-00214-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[SECOND REQUEST]

SFR INVESTMENTS POOL 1, LLC,

Counter/Cross Claimant,

vs.

THE BANK OF NEW YORK MELLON FKA
THE BANK OF NEW YORK AS TRUSTEE
FOR THE CERTIFICATEHOLDERS CWMBS,
INC., CHL MORTGAGE PASS-THROUGH
TRUST 2005-HYB4, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-
HYB4; PATTY TAN, an individual,

Counter/Cross Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

Plaintiff/Counter-Defendant The Bank of New York Mellon fka The Bank of New York as Trustee for the Certificateholders CWMBS, Inc., CHL Mortgage Pass-Through Trust 2005-HYB4, Mortgage Pass-Through Certificates, Series 2005-HYB4 (**BoNYM**), Defendants/Counterclaimant/Cross-Claimant SFR Investments Pool 1, LLC (**SFR**) and Sunrise Ridge Master Homeowners Association (**HOA**), by and through their respective counsel of record, and hereby jointly submit this Stipulation and Order to Extend Discovery Deadlines (Second Request) pursuant to LR 6-1 and LR 26-4. This is the first request to extend the discovery deadlines set by the Scheduling Order entered by the Court on April 18, 2017. ECF No. 23.

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED

1. Rule 26 Disclosures

BoNYM served its initial disclosures on April 10, 2017. SFR served its initial disclosures on April 24, 2017. BoNYM served its first supplement to initial disclosures on May 11, 2017. BoNYM served its second supplement to initial disclosures July 28, 2017. SFR served its first supplement to initial disclosures on June 15, 2017. BoNYM served its initial expert disclosures on November 9, 2017. SFR served its initial expert disclosures on November 13, 2017. SFR served its Rebuttal Expert Disclosure on December 11, 2017. BoNYM served its third supplement to initial disclosures on December 18, 2017. BoNYM served its fourth supplement to initial disclosures on January 16, 2018.

HOA served its initial disclosures on January 23, 2018. HOA served its first supplement to initial disclosures on January 24, 2018. SFR served its second supplement to initial disclosures on March 12, 2018.

2. Written Discovery

BoNYM served SFR with First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on April 20, 2017. BoNYM served HOA with First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on April 20, 2017. SFR served Objections and Responses to First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on May 30, 2017. SFR served BoNYM with First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on December 1, 2017. BoNYM served Responses to First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on January 16, 2018. HOA served its responses to BoNYM's first set of requests for admissions, first set of requests for production, and first set of interrogatories on January 24, 2018.

3. Depositions

BoNYM deposed witness Susan Moses 30(b)(6) representative for Nevada Association Services, Inc. BoNYM deposed witness Mark Stone 30(b)(6) representative for the HOA.

B. STATEMENT OF DISCOVERY REMAINING TO BE COMPLETED

SFR's deposition of BoNYM. The parties reserve the right to conduct additional discovery.

C. REASONS WHY AN EXTENSION IS REQUIRED

BoNYM's deposition was stayed pending this court's decision on BANA's motion for protective order in *Bank of America, N.A. v. Azure Manor/Rancho De Paz Homeowners Ass'n, et al*, D. Nev. Case No. 2:16-cv-00764-GMN-GWF. *See* ECF No. 31. A decision on the *Azure Manor* motion was issued on March 19, 2018. *See* ECF No. 62 in the *Azure Manor* case. The parties request an extension of discovery to accommodate the scheduling of SFR's deposition of BoNYM. Given counsel and witness availability, the parties anticipate scheduling BoNYM's deposition in late April or early May 2018.

D. PROPOSED SCHEDULE FOR ALL REMAINING DISCOVERY

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Cut-Off:	March 12, 2018	May 30, 2018
Dispositive Motions Deadline:	April 9, 2018	June 29, 2018
Pretrial Order Deadline:	May 21, 2018	July 30, 2018

Based on the foregoing, the parties respectfully request the court extend the remaining discovery deadline. The parties make this request in good faith and believe good cause exists for extending these deadlines.

Dated: March 28, 2018

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 3/29/2018